

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**WATSON GRINDING &  
MANUFACTURING CO.,**

Debtor.

**CASE NO. 20-30967**

(Chapter 11)

**TUYET NGA THI  
BANH, VAN VAN LE,  
ALICIA GONZALEZ,  
JOEL GONZALEZ  
MOLINA, ELIZABETH  
GONZALEZ, BRYAN  
CRUZ, MARK CRUZ,  
IRMA DIAZ, JUAN  
DIAZ, BICH LIEN  
BANH, RICARDO  
LOZANO, JOSE  
GUERRERO, LEANOR  
GUERRERO, CARL  
ANDERSON, IRIS  
ARCENEUX,  
BEVERLY AYERS,  
IESHEIA AYERS-  
WILSON, STEPHANIE  
BALLARD,  
INDIVIDUALLY AND  
AS NEXT FRIEND OF  
RB. AND R.J.J.,  
MINORS, CHEYANNE  
BARNES, ROGER  
BARNES, CERMASE  
BARRY,  
INDIVIDUALLY AND  
AS NEXT FRIEND OF  
C.B.J., CHERYL BERRY,  
ODELL BROADY, JR.,  
JERMAINE BROWN,  
SHAWN BROWN,  
SHAUN CHILDS,  
LAKESHIA MCDANIEL,  
INDIVIDUALLY, ON**

ADVERSARY NO. \_\_\_\_\_

BEHALF OF N.C. AND  
Z.C., MINORS, AND ON  
BEHALF OF THE  
ESTATE OF KEITH  
LEWIS, STEPHANIE  
CLARK,  
INDIVIDUALLY AND  
AS NEXT FRIEND OF  
J.C. AND T.C., DEDRIC  
CLOUD, EMANUEL  
CRUMPTON, KEORIE  
CRUMPTON, JOE  
CURRY, SHANGA  
DANIEL, JOHN W.  
EMERSON, WILLIAM  
EVANS, WILLIE RAY  
EVANS, DEBRA  
FABULUJE,  
TERRANCE EUGENE  
FLAX, ECKNOZZIO  
FONTENOT, JAWON  
GAY, EMMER  
HAGGERTY, HELEN  
HAYWOOD, JIM  
HAYWOOD,  
INDIVIDUALLY AND AS  
NEXT FRIEND OF  
H.R.H., A MINOR, DAN  
HOLCOMB JR.,  
GREGORY HOLCOMB,  
IRVING HOLCOMB,  
LENORA HOLCOMB,  
RICKIE HOLCOMB,  
HAROLD HOUSE, JESSE  
HUDSON, DARRYL  
JACKSON SR,  
INDIVIDUALLY AND AS  
NEXT FRIEND OF D.J.J.,  
KATINA BROWN,  
REGINALD K. JONES  
SR., DAMIEN LAWSON,  
ALICE LONG,  
CLABURNE LONG,  
RAPHAEL MALVEAUX,  
MARY FRANCES  
MARTIN-HALL, DANTE  
MCDANIEL, LAKEITH  
MCKINNEY JR.,

[illegible]

INDIVIDUALLY AND AS  
NEXT FRIEND OF  
C.A.M., AND C.O.M.,  
MINORS, HUMBERTO  
MUNGUIA, RASHIED  
MURRAY, TYLAR  
QUALLS,  
INDIVIDUALLY AND AS  
NEXT FRIEND OF S.T.J.,  
M.A.D.N., M.A.R.N. AND  
D.S., MINORS, JOHNNIE  
MAY RAY, VERNON  
RAY, LEONARD REED,  
SIRON REED,  
ASHANAY ROBERTSON,  
DERRICK ROSS,  
INDIVIDUALLY AND AS  
NEXT FRIEND OF  
D.R.J., A MINOR, SHANI  
SAPP, INDIVIDUALLY  
AND AS NEXT FRIEND  
OF D.S., G.S., K.Y.S.,  
K.A.S., MINORS, KIRK  
SIMMONS, CALVIN E.  
SMITH, CHRISTOPHER  
SMITH, JESSICA  
TURNER,  
INDIVIDUALLY AND AS  
NEXT FRIEND OF J.S.  
AND L.S., MINORS,  
LEODIS SMITH  
GWENDOLYN  
STEWART, LIONNEL  
STEWART, VIRGINIA  
TAYLOR, PAMELA  
TINDALL, EUNICE  
TODD, LATASHA  
TONEY, HUBESTER  
URIOSTEGUI, GARY  
WARREN, TIFFANY  
WASHINGTON,  
INDIVIDUALLY AND AS  
NEXT FRIEND OF D.S.  
AND Z.S., MINORS,  
ERNEST BRUCE  
WILLIAMS, SR., ERNEST  
WILLIAMS JR., WILLIE  
MAE WILLIAMS.

[illegible]

**VS.**

**WATSON GRINDING AND  
MANUFACTURING CO, WATSON  
VALVE SERVICES, INC., KMHJ,  
LTD., KMHJ MANAGEMENT  
COMPANY, LLC, 3M COMPANY,  
FIRESTONE CRYOGENICS, INC.,  
FIRESTONE CRYOGENIC  
EQUIPMENT, INC, MATHESON  
TRI-GAS, INC., WESTERN  
INTERNATIONAL GAS &  
CYLINDERS, INC., TELEDYNE  
EXPLORATION COMPANY,  
TELEDYNE TECHNOLOGIES INC.  
F/K/A DETCON, INC., AND  
AUTOMATION PLUS, INC.,**

## Defendants.

**NOTICE OF REMOVAL**

Janet S. Northrup, Chapter 11 Trustee (the “Trustee”) of the Estate of Watson Grinding & Manufacturing Co. (the “Debtor”), files this Notice of Removal of the state court action styled *Tuyet Nga Thi Banb, Van Van Le, Alicia Gonzalez, Joel Gonzalez Molina, Elizabeth Gonzalez, Bryan Cruz, Mark Cruz, Irma Diaz, Juan Diaz, Bich Lien Banb, Ricardo Lozano, Jose Guerrero, Leanor Guerrero, Carl Anderson, Iris Arceneaux, Beverly Ayers, Iesheia Ayers-Wilson, Stephanie Ballard, Individually and As Next Friend of R.B. and R.J.J., Minors, Cheyanne Barnes, Roger Barnes, Cermase Barry, Individually and As Next Friend of C.B.J., Cheryl Berry, Odell Broady, Jr., Jermaine Brown, Shawn Brown, Shaun Childs, Lakeshia McDaniel, Individually, On Behalf of N.C. and Z.C., Minors, and On Behalf of The Estate of Keith Lewis, Stephanie Clark, Individually and As Next Friend of J.C. and T.C., Dedric Cloud, Emanuel Crumpton, Keorie Crumpton, Joe Curry, Shanga Daniel, John W. Emerson, William Evans, Willie Ray Evans, Debra Fabuluje, Terrance Eugene Flax, Ecknozzio Fontenot, Jawon Gay, Emmer Haggerty, Helen Haywood, Jim Haywood, Individually and As Next Friend of H.R.H., a Minor, Dan Holcomb Jr., Gregory Holcomb, Irving Holcomb, Lenora Holcomb, Rickie Holcomb, Harold House, Jesse Hudson, Darryl Jackson Sr, Individually and As Next Friend of D.J.J., Katina Brown, Reginald K. Jones Sr., Damien Lawson, Alice Long, Claburne Long, Raphael Malveaux, Mary Frances Martin-Hall, Dante McDaniel, Lakeith McKinney Jr., Individually and As Next Friend of C.A.M., and C.O.M., Minors, Humberto Munguia, Rashied Murray, Tylar Qualls, Individually and As Next Friend of S.T.J., M.A.D.N., M.A.R.N. and D.S., Minors, Johnnie May Ray, Vernon Ray, Leonard Reed, Sirron Reed, Ashanay Robertson, Derrick Ross, Individually and As Next Friend of D.R.J., A Minor, Shani Sapp, Individually and As Next Friend of D.S., G.S., K.Y.S., K.A.S., Minors, Kirk Simmons, Calvin E. Smith, Christopher Smith, Jessica Turner, Individually and As Next Friend of J.S. and L.S., Minors, Leodis Smith Gwendolyn Stewart, Lionnel Stewart, Virginia Taylor, Pamela Tindall, Eunice Todd, Latasha Toney, Hubester Uriostegui, Gary Warren, Tiffany Washington, Individually and As Next Friend of D.S. and Z.S., Minors, Ernest Bruce Williams, Sr., Ernest*

*Williams Jr., Willie Mae Williams, Howanika Williams, John Henry Williams, Jr., Taisha Williams, America Wilson, Latrisba Jordan, Individually and As Next Friend of C.J., A Minor, Nydia McKinney, Lamarcus McKinney, Kevin Davenport, Angelina Burge-Shults, Yong Cha Kim, Kyung Hee Kim, Lee Han Kyu, Jung Soo Kim, Yong Du Chon, Kang Soon Chon, Hee Dong Cho, Song Cho and Gregorio Guerrero vs. Watson Grinding and Manufacturing Co, Watson Valve Services, Inc., KMHJ, Ltd., KMHJ Management Company, LLC, 3M Company, Firestone Cryogenics, Inc., Firestone Cryogenic Equipment, Inc, Matheson Tri-Gas, Inc., Western International Gas & Cylinders, Inc., Teledyne Exploration Company, Teledyne Technologies Inc. f/k/a Detcon, Inc., and Automation Plus, Inc.*, Cause No. 2020-39065, pending in the 113<sup>th</sup> Judicial District Court of Harris County, Texas (the “State Court Action”).

### **I. Procedural Background and Nature of Suit**

1. On July 8, 2020, Tuyet Nga Thi Banh, *et al.* (collectively, the “Plaintiffs”) filed an Original Petition (the “Original Petition”) against Watson Grinding and Manufacturing Co, Watson Valve Services, Inc., KMHJ, Ltd., KMHJ Management Company, LLC, 3M Company, Firestone Cryogenics, Inc., Firestone Cryogenic Equipment, Inc, Matheson Tri-Gas, Inc., Western International Gas & Cylinders, Inc., Teledyne Exploration Company, Teledyne Technologies Inc. f/k/a Detcon, Inc., and Automation Plus, Inc. (collectively, the “Defendants”). In their Original Petition, the Plaintiffs asserts claims of negligence, gross negligence, strict liability and/or breach of warranty against the Defendants.

2. On July 8, 2020, Western International Gas & Cylinders, Inc. and Matheson Tri-Gas, Inc.’s Crossclaims Against Watson Grinding and Manufacturing Co. and Watson Valve Services, Inc. was filed.

3. On July 16, 2020, Western International Gas & Cylinders, Inc. and Matheson Tri-Gas, Inc. filed their Original Answer.

4. On July 20, 2020, KMHJ, Ltd. and KMHJ Management Company, LLC filed their Original Answer.

5. On February 6, 2020 (the “Petition Date”), the Debtor filed its Voluntary Petition under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), commencing the bankruptcy case captioned *In re Watson Grinding & Manufacturing Co.*, Case No. 20-30967, pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Chapter 11 Bankruptcy Case”).

## **II. Basis for Removal**

6. This Notice of Removal is filed pursuant to 28 U.S.C. § 1452, Bankruptcy Rule 9027, and Local Bankruptcy Rules 9027-1, 9027-2, 9027-3, and the *General Order of Reference* entered by the District Court of this District on March 10, 2005.

7. The State Court Action was initiated after the commencement of the Chapter 11 Case. This Notice of Removal has been timely filed pursuant to Bankruptcy Rule 9027(a)(2). *In re R.E. Loans, LLC*, No. 11-35865, 2012 WL 3262767, at \*2 (Bankr. S.D. Tex. Aug. 8, 2012).

8. Venue in this Court is proper pursuant to 28 U.S.C. § 1409.

9. Cases subject to jurisdiction are removable under the authority of 28 U.S.C. § 1452(a) (“A party may remove any claim or cause of action...to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title”). The State Court Action, including all claims and causes of action asserted therein, is a civil action other than a proceeding before the United States Tax Court. The State Court Action is not a civil action by a government unit to enforce such government unit’s police or regulatory power.

10. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1334(b) (federal district courts have “original jurisdiction of all civil proceedings...arising in or related to cases under

title 11”). The State Court Action “arises in” or, alternatively, is “related to” a Title 11 case, *i.e.* the Debtor’s Chapter 11 Bankruptcy Case. In this circuit, “related to” proceedings include any case whose outcome “could *conceivably* have any effect on the administration of the estate.” *In re Wood*, 825 F.2d 90, 93 (5th Cir. 1987) (emphasis added); *In re Baudoin*, 981 F.2d 736, 740 (5th Cir. 1993).

11. The resolution of this State Court Action will have a direct impact on the bankruptcy estate of the Debtor. The State Court Action is related to the Debtor’s Chapter 11 Bankruptcy Case because the outcome of State Court Action could conceivably change the Debtor’s rights, liabilities, or options in a way that would have an effect upon the handling and administration of the bankruptcy estate.

12. Thus, the claims asserted in the State Court Action are claims that arise in or are otherwise related to the Debtor’s Chapter 11 Case pursuant to 28 U.S.C. § 1334(b), and removal to this Court is proper pursuant to 28 U.S.C. § 1452(a).

### **III. Core or Non-Core Bankruptcy Jurisdiction**

13. This action involves the administration of the Debtor’s estate and is a proceeding affecting the adjustment of the debtor-creditor relationship; it is, therefore, a core proceeding under 28 U.S.C. § 157(b)(2)(A)(B)(C) and (O). The claims and causes of action in the State Court Action have a clear and direct impact on the interests and property of the Debtor’s estate under 11 U.S.C. § 541.

14. Upon removal of the State Court Action, the Trustee consents to the entry of final orders or judgment by the bankruptcy judge.

### **IV. Parties and Notice**

15. Pursuant to 28 U.S.C. § 1452(a), Federal Bankruptcy Rule 9027(b), and Local Rule 9027-1, all adverse parties are being provided with a copy of this Notice of Removal and a copy of



this Notice of Removal is being filed with the clerk of the 113<sup>th</sup> Judicial District Court of Harris County, Texas.

16. In accordance with Local Rule 9027-1(a), the names and addresses of the parties and counsel in the State Court Action, who have or will be served with the notice, are as follows:

<p>Arnold &amp; Itkin LLP Kurt B. Arnold Jason A. Itkin J. Kyle Findley Adam D. Lewis 6009 Memorial Drive Houston, Texas 77007</p> <p><b>ATTORNEYS FOR PLAINTIFFS</b></p>	<p>McCoy Leavitt Laskey LLC John V. McCoy Michael I. Ramirez N19 W24200 Riverwood Dr., Suite 125 Waukesha, WI 53188</p> <p><b>ATTORNEYS FOR WATSON GRINDING &amp; MANUFACTURING CO.</b></p> <p>Gieger, Laborde &amp; Laperouse L.L.C. Ernest P. Gieger, Jr. 701 Poydras Street, Suite 4800 New Orleans, Louisiana 70139</p> <p><b>ATTORNEYS FOR WATSON VALVE SERVICES, INC.</b></p>
<p>Greenberg Traurig, LLP Mary-Olga Lovett 1000 Louisiana St., Suite 1700 Houston, Texas 77002</p> <p>Greenberg Traurig, LLP Christopher M. LaVigne 2200 Ross Avenue, Suite 5200 Dallas, Texas 75201</p> <p><b>ATTORNEYS FOR MATHESON TRI-GAS, INC. AND WESTERN INTERNATIONAL GAS &amp; CYLINDER, INC.</b></p>	<p>Jackson Walker L.L.P. Bruce J. Ruzinsky 1401 McKinney, Suite 1900 Houston, Texas 77010</p> <p>The Silvera Firm Robert C. Turner 17070 Dallas Parkway, Suite 100 Dallas, Texas 75248</p> <p><b>ATTORNEYS FOR KMHJ, LTD. AND KMHJ MANAGEMENT COMPANY, LLC</b></p>

#### V. Process and Pleadings

17. Pursuant to Bankruptcy Rule 9027(a)(1) and Local Bankruptcy Rule 9027-1(b), true and correct copies of all process and pleadings filed in the State Court Action (as set forth in the attached Exhibit “A”) have been provided to this Court.

18. In the State Court Action, citations of service were issued on July 1, 2020. No return of citations have been returned.

19. In accordance with Bankruptcy Rule 9027(c), the Trustee will promptly file a notice of the filing of this Notice of Removal in the State Court Action.

WHEREFORE, the Trustee notifies the United States Bankruptcy Court for the Southern District of Texas, Houston Division, that the State Court Action is hereby removed in its entirety to this Court pursuant to 28 U.S.C. § 1452(a) and Bankruptcy Rule 9027.

Dated: July 30, 2020.

Respectfully submitted,

**JONES MURRAY & BEATTY, LLP**

By: /s/ Ruth Van Meter

Erin E. Jones

Texas Bar No. 24032478

Ruth Van Meter

Texas Bar No. 20661570

4119 Montrose Blvd, Suite 230

Houston, Texas 77006

Phone: 832-529-1999

Fax: 832-529-5513

[erin@jmbllp.com](mailto:erin@jmbllp.com)

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**SPECIAL COUNSEL FOR JANET S.  
NORTHROP, CHAPTER 11 TRUSTEE OF THE  
ESTATE OF WATSON GRINDING &  
MANUFACTURING CO.**

**HUGHESWATTERSASKANASE, LLP**

By: /s/ Wayne Kitchens  
Wayne Kitchens  
Texas Bar No. 11541110  
Heather McIntyre  
Texas State Bar No. 24041076  
Total Plaza  
1201 Louisiana, 28<sup>th</sup> Floor  
Houston, Texas 77002  
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[hmcintyre@hwa.com](mailto:hmcintyre@hwa.com)

**COUNSEL FOR JANET S. NORTHRUP,  
CHAPTER 11 TRUSTEE OF THE ESTATE OF  
WATSON GRINDING & MANUFACTURING  
CO.**

AND

**McCOY LEAVITT LASKEY LLC**

By: /s/ Michael I. Ramirez  
Michael I. Ramirez  
Texas Bar No. 24008604  
20726 Stone Oak Parkway, Suite 116  
San Antonio, TX 78258  
Telephone (210) 446-2828  
Fax (262) 522-7020  
[mramirez@mlllaw.com](mailto:mramirez@mlllaw.com)

**COUNSEL FOR WATSON GRINDING &  
MANUFACTURING CO.**

**CERTIFICATE OF SERVICE**

I certify that on July 30, 2020, a true and correct copy of the foregoing Notice was served via ECF/PACER to all parties registered to receive such service and via first class mail (without attachments) on a date to be supplemented to the following:

<p>Arnold &amp; Itkin LLP Kurt B. Arnold Jason A. Itkin J. Kyle Findley Adam D. Lewis 6009 Memorial Drive Houston, Texas 77007</p> <p><b>ATTORNEYS FOR PLAINTIFFS</b></p>	<p>McCoy Leavitt Laskey LLC John V. McCoy Michael I. Ramirez N19 W24200 Riverwood Dr., Suite 125 Waukesha, WI 53188</p> <p><b>ATTORNEYS FOR WATSON GRINDING &amp; MANUFACTURING CO.</b></p> <p>Gieger, Laborde &amp; Laperouse L.L.C. Ernest P. Gieger, Jr. 701 Poydras Street, Suite 4800 New Orleans, Louisiana 70139</p> <p><b>ATTORNEYS FOR WATSON VALVE SERVICES, INC.</b></p>
<p>Greenberg Traurig, LLP Mary-Olga Lovett 1000 Louisiana St., Suite 1700 Houston, Texas 77002</p> <p>Greenberg Traurig, LLP Christopher M. LaVigne 2200 Ross Avenue, Suite 5200 Dallas, Texas 75201</p> <p><b>ATTORNEYS FOR MATHESON TRI-GAS, INC. &amp; WESTERN INTERNATIONAL GAS &amp; CYLINDER, INC.</b></p>	<p>Jackson Walker L.L.P. Bruce J. Ruzinsky 1401 McKinney, Suite 1900 Houston, Texas 77010</p> <p>The Silvera Firm Robert C. Turner 17070 Dallas Parkway, Suite 100 Dallas, Texas 75248</p> <p><b>ATTORNEYS FOR KMHJ, LTD. AND KMHJ MANAGEMENT COMPANY, LLC</b></p>

/s/ Ruth Van Meter

Ruth Van Meter

**EXHIBIT A**

**2020-39065**

**COURT:** 113th

**FILED DATE:** 6/30/2020

**CASE TYPE:** Other Injury or Damage



**THI BANH, TUYET NGA**

Attorney: ARNOLD, KURT BRYNILDE

**VS.**

**WATSON GRINDING AND MANUFACTURING CO**

**Docket Sheet Entries**

**Date**

**Comment**

CAUSE NO. \_\_\_\_\_

Tuyet Nga Thi Banh, et al;

§

IN THE DISTRICT COURT OF

§

*Plaintiffs,*

§

§

v.

§

§

HARRIS COUNTY, TEXAS

Watson Grinding and Manufacturing

§

Co; Watson Valve Services, Inc.;

§

KMHJ, Ltd.; KMHJ Management

§

Company, LLC; 3M Company; Firestone

§

Cryogenics, Inc.; Firestone Cryogenic

§

Equipment, Inc; Matheson Tri-Gas, Inc.;

§

Western International Gas &amp; Cylinders, Inc;

§

Teledyne Exploration Company; Teledyne

§

Technologies Inc. f/k/a Detcon, Inc. and

§

Automation Plus, Inc.

§

§

*Defendants.*

§

\_\_\_\_\_ JUDICIAL DISTRICT

**PLAINTIFFS' ORIGINAL PETITION**

Plaintiffs Tuyet Nga Thi Banh; Van Van Le; Alicia Gonzalez; Joel Gonzalez Molina; Elizabeth Gonzalez; Bryan Cruz; Mark Cruz; Irma Diaz; Juan Diaz; Bich Lien Banh; Ricardo Lozano; Jose Guerrero; Leanor Guerrero; Carl Anderson; Iris Arceneaux; Beverly Ayers; Iesheia Ayers-Wilson; Stephanie Ballard, individually and as next friend of R.B. and R.J.J., minors; Cheyanne Barnes; Roger Barnes; Cermase Barry, individually and as next friend of C.B.J.; Cheryl Berry; Odell Broady, Jr.; Jermaine Brown; Shawn Brown; Shaun Childs; Lakeshia McDaniel, individually, on behalf of N.C. and Z.C., minors, and on behalf of the Estate of Keith Lewis; Stephanie Clark, individually and as next friend of J.C. and T.C.; Dedric Cloud; Emanuel Crumpton; Keorie Crumpton; Joe Curry; Shanga Daniel; John W. Emerson; William Evans; Willie Ray Evans; Debra Fabuluje; Terrance Eugene Flax; Ecknozzio Fontenot; Jawon Gay; Emmer Haggerty; Helen Haywood; Jim Haywood,

individually and as next friend of H.R.H., a minor; Dan Holcomb Jr.; Gregory Holcomb; Irving Holcomb; Lenora Holcomb; Rickie Holcomb; Harold House; Jesse Hudson; Darryl Jackson Sr.; individually and as next friend of D.J.J.; Katina Brown; Reginald K. Jones Sr.; Damien Lawson; Alice Long; Claburne Long; Raphael Malveaux; Mary Frances Martin-Hall; Dante McDaniel; LaKeith McKinney Jr., individually and as next friend of C.A.M., and C.O.M., minors; Humberto Munguia; Rashied Murray; Tylar Qualls, individually and as next friend of S.T.J.; M.A.D.N., M.A.R.N. and D.S., minors; Johnnie May Ray; Vernon Ray; Leonard Reed; Sirron Reed; Ashanay Robertson; Derrick Ross, individually and as next friend of D.R.J., a minor; Shani Sapp; individually and as next friend of D.S., G.S., K.Y.S., K.A.S., minors; Kirk Simmons; Calvin E. Smith; Christopher Smith; Jessica Turner, individually and as next friend of J.S. and L.S., minors; Leodis Smith Gwendolyn Stewart; Lionnel Stewart ; Virginia Taylor; Pamela Tindall; Eunice Todd; Latasha Toney; Hubester Uriostegui; Gary Warren; Tiffany Washington, individually and as next friend of D.S. and Z.S., minors; Ernest Bruce Williams, Sr.; Ernest Williams Jr.; Willie Mae Williams; Howanika Williams; John Henry Williams, Jr.; Taisha Williams; America Wilson; LaTrisha Jordan, individually and as next friend of C.J., a minor; Nydia McKinney; LaMarcus McKinney; Kevin Davenport; Angelina Burge-Shults; Yong Cha Kim; Kyung Hee Kim; Lee Han Kyu; Jung Soo Kim; Yong Du Chon; Kang Soon Chon; Hee Dong Cho and Song Cho (hereinafter collectively referred to as “Plaintiffs”) complain of Watson Grinding and Manufacturing Co; Watson Valve Services, Inc.; KMHJ, Ltd.; KMHJ Management Company, LLC; 3M Company; Firestone Cryogenics, Inc.; Firestone Cryogenic Equipment, Inc; Matheson Tri-Gas, Inc.; Western International Gas & Cylinders, Inc., Teledyne Exploration Company; Teledyne Technologies Inc. f/k/a Detcon,



Inc. and Automation Plus, Inc. (hereinafter collectively referred to as “Defendants”) and would respectfully show the Court that:

**I.**

**JURISDICTION & VENUE**

1. The claims asserted arise under the common laws of Texas. This Court has jurisdiction and venue is proper because the events giving rise to this lawsuit occurred in this County. TEX. CIV. PRAC. & REM. CODE § 15.002. Further, Defendants are residents of Harris County, Texas, and therefore, the case is not removable.

**II.**

**DISCOVERY LEVEL**

2. Discovery in this matter may be conducted under Level 2 of the Texas Rules of Civil Procedure.

**III.**

**PARTIES**

3. Plaintiff Tuyet Nga Thi Banh is a Texas resident.
4. Plaintiff Van Van Le is a Texas resident.
5. Plaintiff Alicia Gonzalez is a Texas resident.
6. Plaintiff Joel Gonzalez Molina is a Texas resident.
7. Plaintiff Elizabeth Gonzalez is a Texas resident.
8. Plaintiff Bryan Cruz is a Texas resident.
9. Plaintiff Mark Cruz is a Texas resident.
10. Plaintiff Irma Diaz is a Texas resident.
11. Plaintiff Juan Diaz is a Texas resident.

12. Plaintiff Bich Lien Banh is a Texas resident.

13. Plaintiff Ricardo Lozano is a Texas resident.

14. Plaintiff Jose Guerrero is a Texas resident.

15. Plaintiff Leonor Guerrero is a Texas resident.

16. Plaintiff Carl Anderson is a Texas resident.

17. Plaintiff Iris Arceneaux is a Texas resident.

18. Plaintiff Beverly Ayers is a Texas resident.

19. Iesheia Ayers-Wilson is a Texas resident.

20. Plaintiff Stephanie Ballard, individually and as next friend of R.B. and R.J.J., minors are Texas residents.

21. Plaintiff Cheyanne Barnes is a Texas resident.

22. Plaintiff Roger Barnes is a Texas resident.

23. Plaintiff Cermase Barry, individually and as next friend of C.B.J., a minor are Texas residents.

24. Plaintiff Cheryl Berry is a Texas resident.

25. Plaintiff Odell Broady, Jr. is a Texas resident.

26. Plaintiff Jermaine Brown is a Texas resident.

27. Plaintiff Shawn Brown is a Texas resident.

28. Plaintiff Shaun Childs is a Texas resident.

29. Plaintiff Lakeshia McDaniel, individually, on behalf of N.C. and Z.C., minors, and on behalf of the Estate of Keith Lewis are Texas residents.

30. Plaintiff Stephanie Clark, individually and as next friend of J.C. and T.C., minors are Texas residents.

31. Plaintiff Dedric Cloud is a Texas resident.
32. Plaintiff Emanuel Crumpton is a Texas resident.
33. Plaintiff Keorie Crumpton is a Texas resident.
34. Plaintiff Joe Curry is a Texas resident.
35. Plaintiff Shanga Daniel is a Texas resident.
36. Plaintiff John W. Emerson is a Texas resident.
37. Plaintiff William Evans is a Texas resident.
38. Plaintiff Willie Ray Evans is a Texas resident.
39. Plaintiff Debra Fabuluje is a Texas resident.
40. Plaintiff Terrance Eugene Flax is a Texas resident.
41. Plaintiff Ecknozzio Fontenot; Jawon Gay
42. Plaintiff Emmer Haggerty is a Texas resident.
43. Plaintiff Helen Haywood is a Texas resident.
44. Plaintiff Jim Haywood, individually and as next friend of H.R.H., a minor are

Texas residents.

45. Plaintiff Dan Holcomb Jr. is a Texas resident.
46. Plaintiff Gregory Holcomb is a Texas resident.
47. Plaintiff Irving Holcomb is a Texas resident.
48. Plaintiff Lenora Holcomb is a Texas resident.
49. Plaintiff Rickie Holcomb is a Texas resident.
50. Plaintiff Harold House is a Texas resident.
51. Plaintiff Jesse Hudson is a Texas resident.

52. Plaintiff Darryl Jackson Sr; individually and as next friend of D.J.J., a minor are Texas residents.

53. Plaintiff Katina Brown is a Texas resident.

54. Plaintiff Reginald K. Jones Sr. is a Texas resident.

55. Plaintiff Damien Lawson is a Texas resident.

56. Plaintiff Alice Long is a Texas resident.

57. Plaintiff Claburne Long is a Texas resident.

58. Plaintiff Raphael Malveaux is a Texas resident.

59. Plaintiff Mary Frances Martin-Hall is a Texas resident.

60. Plaintiff Dante McDaniel is a Texas resident.

61. Plaintiff LaKeith McKinney Jr., individually and as next friend of C.A.M. and C.O.M., minors are Texas residents.

62. Plaintiff Humberto Munguia is a Texas resident.

63. Plaintiff Rashied Murray is a Texas resident.

64. Plaintiff Tylar Qualls, individually and as next friend of S.T.J. M.A.D.N., M.A.R.N. and D.S., minors are Texas residents.

65. Plaintiff Johnnie May Ray is a Texas resident.

66. Plaintiff Vernon Ray is a Texas resident.

67. Plaintiff Leonard Reed is a Texas resident.

68. Plaintiff Sirron Reed is a Texas resident.

69. Plaintiff Ashanay Robertson is a Texas resident.

70. Plaintiff Derrick Ross, individually and as next friend of D.R.J., a minor are Texas residents.

71. Plaintiff Shani Sapp; individually and as next friend of D.S., G.S., K.Y.S., K.A.S., minors are Texas residents.

72. Plaintiff Kirk Simmons is a Texas resident.

73. Plaintiff Calvin E. Smith is a Texas resident.

74. Plaintiff Christopher Smith is a Texas resident.

75. Plaintiff Jessica Turner, individually and as next friend of J.S. and L.S., minors are Texas residents.

76. Plaintiff Leodis Smith is a Texas resident.

77. Plaintiff Gwendolyn Stewart is a Texas resident.

78. Plaintiff Lionnel Stewart is a Texas resident.

79. Plaintiff Virginia Taylor is a Texas resident.

80. Plaintiff Pamela Tindall is a Texas resident.

81. Plaintiff Eunice Todd is a Texas resident.

82. Plaintiff Latasha Toney is a Texas resident.

83. Plaintiff Hubester Uriostegui is a Texas resident.

84. Plaintiff Gary Warren is a Texas resident.

85. Plaintiff Tiffany Washington, individually and as next friend of D.S. and Z.S., minors are Texas residents.

86. Plaintiff Ernest Bruce Williams, Sr. is a Texas resident.

87. Plaintiff Ernest Williams Jr. is a Texas resident.

88. Plaintiff Willie Mae Williams is a Texas resident.

89. Plaintiff Howanika Williams is a Texas resident.

90. Plaintiff John Henry Williams, Jr. is a Texas resident.

91. Plaintiff Taisha Williams is a Texas resident.

92. Plaintiff America Wilson is a Texas resident.

93. Plaintiff LaTrisha Jordan, individually and as next friend of C.J., a minor are Texas residents.

94. Plaintiff Nydia McKinney is a Texas resident.

95. Plaintiff LaMarcus McKinney is a Texas resident.

96. Plaintiff Kevin Davenport is a Texas resident.

97. Plaintiff Angelina Burge-Shults is a Texas resident.

98. Plaintiff Yong Cha Kim is a Texas resident.

99. Plaintiff Kyung Hee Kim is a Texas resident.

100. Plaintiff Lee Han Kyu is a Texas resident.

101. Plaintiff Jung Soo Kim is a Texas resident.

102. Plaintiff Yong Du Chon is a Texas resident.

103. Plaintiff Kang Soon Chun is a Texas resident.

104. Plaintiff Hee Dong Cho is a Texas resident.

105. Plaintiff Song Cho is a Texas resident.

106. Defendant Watson Grinding and Manufacturing Co. (“Watson Grinding”) is a Texas entity with a principal place of business in Harris County. This Defendant may be served through its registered agent, John M. Watson at 4525 Gessner Road, Houston, Texas 77041, or wherever he may be found.

107. Watson Valve Services, Inc. (“Watson Valve”) is a Texas entity with a principal place of business in Harris County. This Defendant may be served with process through its registered agent, John M. Watson at 4525 Gessner Road, Houston, Texas 77041, or wherever he may be found.

108. Defendant KMHJ, Ltd. (“KMHJ”) is Texas entity with a principal place of business located in Harris County. This Defendant may be served through its registered agent, KMHJ Management Company, LLC, at 1400 McKinney Street, #1212, Houston, Texas 77010.

109. Defendant KMHJ Management Company, LLC (“KMHJ Management”) is Texas entity with a principal place of business located in Harris County. This Defendant may be served through its registered agent, Kelly Watson at 1400 McKinney Street, #1212, Houston, Texas 77010, or wherever she may be found.

110. Defendant 3M Company (“3M”) is a foreign corporation that is registered and does a substantial amount of business in the state of Texas. This Defendant may be served through its registered agent, CSC-Lawyers Incorporating Service Company, 211 E. 7th St, Suite 620, Austin, Texas 78701.

111. Firestone Cryogenics, Inc. (“Firestone”) is a Texas entity with its principal place of business in Conroe, Texas and does a substantial amount of business in Harris County. This Defendant may be served through its registered agent, Linda Plummer at 12446 Cutten Road, Houston Texas 77066 or wherever she may be found.

112. Firestone Cryogenic Equipment, Inc. (“Firestone Equipment”) is a Texas entity with its principal place of business in Conroe, Texas and does a substantial amount of business in Harris County. This Defendant may be served through its registered agent, Linda Plummer at 12446 Cutten Road, Houston, Texas 77066 or wherever she may be found.

113. Defendant Matheson Tri-Gas, Inc. (“Matheson”) is a foreign corporation with its principal place of business in Basking Ridge, New Jersey and does a substantial amount of business in Texas. This Defendant may be served through its registered agent, CT Corporation System at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

114. Western International Gas & Cylinders, Inc. (“Western”) is a Texas entity with its principal place of business in Irving, Texas. This Defendant may be served through its registered agent Denise C. Haugen at 7173 Highway 159 E., Bellville, Texas 77418 or wherever she may be found.

115. Teledyne Exploration Company (“Teledyne”) is a foreign corporation with its principal place of business in Pittsburgh, Pennsylvania and does a substantial amount of business in Texas. This Defendant may be served through its registered CT Corporation at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

116. Teledyne Technologies Inc. f/k/a Detcon, Inc. (“Teledyne Technologies”) is a foreign corporation with its principal place of business in Thousand Oaks, California and does a substantial amount of business in Texas. This Defendant may be served through its registered Cogency Global, Inc., 1601 Elm Street, Suite 4360, Dallas, Texas 75201.

117. Automation Plus, Inc. (“Automation”) is a Texas corporation with a principal place of business in Harris County, Texas. This Defendant may be served through its registered Frank Lomelo at 3705 Pine Lawn Drive, Pearland, Texas 77581.

#### IV.

#### **NATURE OF THE ACTION**

118. On or about January 24, 2020, Plaintiffs suffered significant injuries and property damage as a result of Defendants’ negligence and gross negligence at a commercial



facility (“the Facility”) in northwest Houston. At all material times, Plaintiffs’ were homeowners, residents, and guests in the area(s) surrounding the Facility. The Facility is owned, operated and maintained by Defendants Watson Valve, Watson Grinding, KMHJ and KMHJ Management.

119. On the date of the underling incident, Plaintiffs were caused serious injuries and property damage due to a catastrophic explosion occurred related to tanks and associated equipment at the Facility. The explosion was tremendous and could be felt miles away. Given Plaintiffs’ proximity to the explosion their homes and bodies were caused serious damage and personal injury, including but not limited to injuries to their heads, necks, backs, spines, knees, elbows, and other parts of their bodies.

120. Upon Information and belief, Defendants Western and Matheson provided tank(s), tank contents and associated equipment involved in the underlying incident. Moreover, Defendants 3M, Western, Teledyne and Teledyne Technologies provided safety equipment/systems, including those related to chemical/gas detection. This equipment was were part of the Facility infrastructure and designed to regulate gas as it flowed through piping, which was installed by Defendants Automation, Firestone and Firestone Equipment.

## V.

### CAUSES OF ACTION

#### *A. Negligence and Gross Negligence Claims (against all Defendants)*

121. Plaintiffs repeat and reallege each allegation contained above.

122. Plaintiffs sustained injuries because of Defendants’ negligence and gross negligence when Defendants:

- a. failed to properly train their employees;

- b. failed to provide adequate equipment;
- c. failed to properly supervise their employees;
- d. failed to conduct adequate maintenance;
- e. failed to maintain their facility;
- f. failed to maintain their equipment;
- g. failed to properly supervise work being performed;
- h. failed to provide adequate warning to Plaintiffs of the dangerous condition;
- i. failed to inform Plaintiffs of the defective nature of the condition;
- j. failed to provide adequate instruction;
- k. failed to properly inspect the premises;
- l. failed to implement adequate safety policies and procedures;
- m. failed to ensure its safety systems were adequate and functional;
- n. failed to implement adequate explosion prevention systems;
- o. failed to implement adequate fire prevention systems;
- p. failed to properly train its safety personnel to prevent explosions such the one underlying this suit;
- q. violations of applicable rules, regulations and standards;
- r. vicariously liable for the act(s) and omission(s) of their employee(s) and agent(s); and
- s. other acts deemed negligent and grossly negligent.

123. As a direct and proximate result of Defendants' conduct, Plaintiffs sustained severe injuries to their bodies which resulted in physical pain, mental anguish, and other

medical problems. Plaintiffs have sustained severe pain, physical impairment, discomfort, mental anguish, and distress. In all reasonable probability, Plaintiffs' physical pain, physical impairment and mental anguish will continue indefinitely. Plaintiffs have also suffered a loss of earnings in the past, as well as a loss of future earning capacity. Plaintiffs have incurred and will continue to incur pharmaceutical and medical expenses in connection with his injuries. Moreover, Plaintiffs have suffered property damage, including but not limited to loss of the use and enjoyment of their property loss in value of property; and other property damage. Defendants are liable because their negligence and/or gross negligence proximately caused Plaintiffs' injuries.

124. In addition, Plaintiffs are entitled to punitive damages because the aforementioned actions of Defendants were grossly negligent. Defendants acted with flagrant and malicious disregard of Plaintiffs' and others' health and safety. Defendants were objectively aware of the extreme risk posed by the conditions which caused Plaintiffs' injuries, but did nothing to rectify them. Defendants' acts and omissions involved an extreme degree of risk considering the probability and magnitude of potential harm to Plaintiffs and others. Defendants had actual, subjective awareness of the risk, and consciously disregarded such risk. Accordingly, Plaintiffs is entitled to and seeks exemplary damages.

**B. *Strict Liability (against Defendants Western, Matheson, 3M, Western, Teledyne, Teledyne Technologies, Automation, Firestone and Firestone Equipment).***

125. Plaintiffs repeat and reallege each allegation contained above.

126. For the following section, "the product" shall refer to: tank(s) and associated equipment for Defendants Western and Matheson; piping and associated equipment for

Defendants Automation, Firestone and Firestone Equipment; gas detection and monitoring equipment for Defendants 3M, Western, Teledyne and Teledyne Technologies.

127. Defendant manufactured, designed, distributed and/or sold the product that injured Plaintiffs with design, manufacturing, and/or marketing defects.

128. *Marketing Defect and Failure to Warn:* The product was designed, manufactured, distributed, and/or sold with one or more marketing defects.

- There was an unreasonable risk in the intended or reasonably foreseeable use of such product;
- Defendant knew, foresaw, or should have known for foreseen the above risk;
- Defendant failed to adequately warn Plaintiffs of the risks, failed to instruct Plaintiffs of the above risks, and/or failed to adequately instruct Plaintiffs how to avoid the dangers.
- The marketing defect(s) rendered the product unreasonably dangerous.

129. *Design Defect:* The product was designed, manufactured, distributed and/or sold with one or more design defects.

- Defendant designed the product and knew of safer alternative designs that were available at the time of production.
- The safer alternative designs would have prevented or significantly reduced the above risks without substantially impairing the product's utility.
- The safer alternative design was economically and technologically feasible at the time the product left the control of Defendant.
- The design defect(s) rendered the product unreasonably dangerous.

130. *Manufacturing Defect:* The product was designed, manufactured, distributed, and/or sold with one or more manufacturing defects. The Defendant manufactured the

condition and at the time deviated in the quality of construction, plan and/or specifications rendering the condition unreasonably dangerous.

131. The design, manufacturing, and/or marketing defect(s) rendered the product unreasonably dangerous.

132. The design, manufacturing, and/or marketing defect(s), which rendered the product unreasonably dangerous were the producing causes to Plaintiffs' injuries.

**C. *Breach of Warranty (against Defendants Western, Matheson, 3M, Western, Teledyne, Teledyne Technologies, Automation, Firestone and Firestone Equipment).***

133. Plaintiffs repeat and reallege each allegation contained above.

134. Defendants, their agents, servants and employees impliedly and expressly warranted that they would properly, adequately and safely design, construct, test and install the tank(s) and associated equipment and systems at the Facility, including all its components, including but not limited to the detection, prevention and safety system(s). Defendants, their agents, servants and employees breached these warranties in one or more of the following ways:

- Failing to perform their work in a good and workmanlike manner;
- Failing to adequately design the tank systems;
- Failing to adequately design the safety and detection systems;
- Failing to adequately design the system component parts;
- Failing to properly test the tank systems;
- Failing to properly test the safety and detection systems;
- Failing to properly test the component parts;

- Failing to provide the tank systems for its intended purpose;
- Failing to provide the safety and detection systems for its intended purpose;
- Failing to provide the components parts for their intended purpose;
- Other various breaches of warranty.

135. Plaintiffs suffered injuries and direct damages as a proximate result of Defendants breach of the express and implied warranties. Further, Plaintiffs suffered actual and consequential damages as a proximate result of Defendants' breach of express and implied warranties.

## **VI.**

### **DAMAGES**

136. As a result of Defendants' negligence, gross negligence and premises liability, Plaintiffs have suffered and seeks recovery for the following in an amount in excess of \$1,000,000.00:

- Compensatory damages against Defendants;
- Actual damages;
- Consequential damages;
- Pain and suffering;
- Exemplary damages;
- Past and future mental anguish;
- Past and future impairment;
- Past and future disfigurement;
- Interest on damages (pre and post-judgment) in accordance with the law;

- Costs of Court;
- Expert witness fees;
- Property use;
- Loss of use of property;
- Diminution in value of property;
- Costs of copies of depositions; and
- Such other and further relief as the Court may deem just and proper.

**VII.**

**PRAYER**

Plaintiffs prays that this citation issue and be served upon Defendants in a form and manner prescribed by law, requiring that Defendants appear and answer, and that upon final hearing, Plaintiffs have judgment against Defendants in a total sum in excess of the minimum jurisdictional limits of this Court, plus pre-judgment and post-judgment interests, all costs of Court, exemplary damages, attorneys' fees, and all such other and further relief, to which they may show themselves justly entitled.

**VIII.**

**JURY TRIAL DEMANDED**

Plaintiffs hereby demand a trial by jury.

Respectfully submitted,

ARNOLD & ITKIN LLP

*/s/ Kurt B. Arnold*

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Kurt B. Arnold  
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Tel: 713.222.3800  
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e-service@arnolditkin.com

**ATTORNEYS FOR PLAINTIFFS**





I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136237 Total Pages: 18

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**Marilyn Burgess**

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Watson Valve Services, Inc.Address of Service: 4525 Gessner RoadCity, State & Zip: Houston, Texas 77041Agent (if applicable) John M. Watson

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias ☐ Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not an E-Issuance) ☐ Attachment
- ☐ Certiorari ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)  
*Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.  
Visit www.hcdistrictclerk.com for more instructions.*
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain Please email kbateam@arnolditkin.com

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Watson Grinding and Manufacturing Co.Address of Service: 4525 Gessner RoadCity, State & Zip: Houston, Texas 77041Agent (if applicable) John M. Watson

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias ☐ Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not an E-Issuance) ☐ Attachment
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- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)  
*Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.  
Visit www.hcdistrictclerk.com for more instructions.*
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain Please email kbateam@arnolditkin.com

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



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HARRIS COUNTY, TEXAS

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# Marilyn Burgess

## HARRIS COUNTY DISTRICT CLERK

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/20 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: KMHJ Management Company, LLCAddress of Service: 1400 McKinney Street #1212City, State & Zip: Houston, Texas 77010Agent (if applicable) Kelly Watson

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- |  |   |  |   |
|--|---|--|---|
| <input checked="" type="checkbox"/> Citation                   | <input type="checkbox"/> Citation by Posting          | <input type="checkbox"/> Citation by Publication | <input type="checkbox"/> Citations Rule 106 Service |
| <input type="checkbox"/> Citation Scire Facias                 | Newspaper _____                                       |  |   |
| <input type="checkbox"/> Temporary Restraining Order           | <input type="checkbox"/> Precept                      | <input type="checkbox"/> Notice                  |   |
| <input type="checkbox"/> Protective Order                      |   |  |   |
| <input type="checkbox"/> Secretary of State Citation (\$12.00) | <input type="checkbox"/> Capias (not an E-Issuance)   | <input type="checkbox"/> Attachment              |   |
| <input type="checkbox"/> Certiorari                            | <input type="checkbox"/> Highway Commission (\$12.00) |  |   |
| <input type="checkbox"/> Commissioner of Insurance (\$12.00)   | <input type="checkbox"/> Hague Convention (\$16.00)   | <input type="checkbox"/> Garnishment             |   |
| <input type="checkbox"/> Habeas Corpus                         | <input type="checkbox"/> Injunction                   | <input type="checkbox"/> Sequestration           |   |
| <input type="checkbox"/> Subpoena                              |   |  |   |
| <input type="checkbox"/> Other (Please Describe) _____         |   |  |   |

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- |  |   |
|--|---|
| <input type="checkbox"/> ATTORNEY PICK-UP (phone) _____  | <input checked="" type="checkbox"/> E-Issuance by District Clerk<br>(No Service Copy Fees Charged)  |
| <input type="checkbox"/> MAIL to attorney at: _____  | Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.<br>Visit www.hcdistrictclerk.com for more instructions. |
| <input type="checkbox"/> CONSTABLE   |   |
| <input type="checkbox"/> CERTIFIED MAIL by District Clerk  |   |
| <input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____ |   |
| <input type="checkbox"/> OTHER, explain <u>Please email kbateam@arnolditkin.com</u>              |   |

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

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HARRIS COUNTY, TEXAS

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/20 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: KMHJ, Ltd.Address of Service: 1400 McKinney Street #1212City, State & Zip: Houston, Texas 77010Agent (if applicable) KMHJ Management Company, LLC

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias ☐ Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not an E-Issuance) ☐ Attachment
- ☐ Certiorari ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)  
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Visit www.hcdistrictclerk.com for more instructions.*
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain Please email kbateam@arnolditkin.com

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800





I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136241 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**Marilyn Burgess**

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: 3M CompanyAddress of Service: 211 E. 7th St., Suite 620City, State & Zip: Austin, Texas 78701Agent (if applicable) CSC-Lawyers Incorporating Service Company

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- |  |   |  |   |
|--|---|--|---|
| <input checked="" type="checkbox"/> Citation                   | <input type="checkbox"/> Citation by Posting          | <input type="checkbox"/> Citation by Publication | <input type="checkbox"/> Citations Rule 106 Service |
| <input type="checkbox"/> Citation Scire Facias                 | Newspaper _____                                       |  |   |
| <input type="checkbox"/> Temporary Restraining Order           | <input type="checkbox"/> Precept                      | <input type="checkbox"/> Notice                  |   |
| <input type="checkbox"/> Protective Order                      |   |  |   |
| <input type="checkbox"/> Secretary of State Citation (\$12.00) | <input type="checkbox"/> Capias (not an E-Issuance)   | <input type="checkbox"/> Attachment              |   |
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| <input type="checkbox"/> Commissioner of Insurance (\$12.00)   | <input type="checkbox"/> Hague Convention (\$16.00)   | <input type="checkbox"/> Garnishment             |   |
| <input type="checkbox"/> Habeas Corpus                         | <input type="checkbox"/> Injunction                   | <input type="checkbox"/> Sequestration           |   |
| <input type="checkbox"/> Subpoena                              |   |  |   |
| <input type="checkbox"/> Other (Please Describe) _____         |   |  |   |

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- |  |   |
|--|---|
| <input type="checkbox"/> ATTORNEY PICK-UP (phone) _____  | <input checked="" type="checkbox"/> E-Issuance by District Clerk<br>(No Service Copy Fees Charged)  |
| <input type="checkbox"/> MAIL to attorney at: _____  | <i>Note:</i> The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.<br>Visit <a href="http://www.hcdistrictclerk.com">www.hcdistrictclerk.com</a> for more instructions. |
| <input type="checkbox"/> CONSTABLE   |   |
| <input type="checkbox"/> CERTIFIED MAIL by District Clerk  |   |
| <input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____ |   |
| <input type="checkbox"/> OTHER, explain <u>Please email kbateam@arnolditkin.com</u>              |   |

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136242 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**Marilyn Burgess**

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Firestone Cryogenics, Inc.Address of Service: 12446 Cutten RoadCity, State & Zip: Houston, Texas 77066Agent (if applicable) Linda Plummer

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- |  |   |  |   |
|--|---|--|---|
| <input checked="" type="checkbox"/> Citation                   | <input type="checkbox"/> Citation by Posting          | <input type="checkbox"/> Citation by Publication | <input type="checkbox"/> Citations Rule 106 Service |
| <input type="checkbox"/> Citation Scire Facias                 | Newspaper _____                                       |  |   |
| <input type="checkbox"/> Temporary Restraining Order           | <input type="checkbox"/> Precept                      | <input type="checkbox"/> Notice                  |   |
| <input type="checkbox"/> Protective Order                      |   |  |   |
| <input type="checkbox"/> Secretary of State Citation (\$12.00) | <input type="checkbox"/> Capias (not an E-Issuance)   | <input type="checkbox"/> Attachment              |   |
| <input type="checkbox"/> Certiorari                            | <input type="checkbox"/> Highway Commission (\$12.00) |  |   |
| <input type="checkbox"/> Commissioner of Insurance (\$12.00)   | <input type="checkbox"/> Hague Convention (\$16.00)   | <input type="checkbox"/> Garnishment             |   |
| <input type="checkbox"/> Habeas Corpus                         | <input type="checkbox"/> Injunction                   | <input type="checkbox"/> Sequestration           |   |
| <input type="checkbox"/> Subpoena                              |   |  |   |
| <input type="checkbox"/> Other (Please Describe) _____         |   |  |   |

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- |  |   |
|--|---|
| <input type="checkbox"/> ATTORNEY PICK-UP (phone) _____  | <input checked="" type="checkbox"/> E-Issuance by District Clerk<br>(No Service Copy Fees Charged)  |
| <input type="checkbox"/> MAIL to attorney at: _____  | <i>Note:</i> The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.<br>Visit <a href="http://www.hcdistrictclerk.com">www.hcdistrictclerk.com</a> for more instructions. |
| <input type="checkbox"/> CONSTABLE   |   |
| <input type="checkbox"/> CERTIFIED MAIL by District Clerk  |   |
| <input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____ |   |
| <input type="checkbox"/> OTHER, explain <u>Please email kbateam@arnolditkin.com</u>              |   |

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136243 Total Pages: 1

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HARRIS COUNTY, TEXAS

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# Marilyn Burgess

## HARRIS COUNTY DISTRICT CLERK

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Firestone Cryogenic Equipment, Inc.Address of Service: 12446 Cutten RoadCity, State & Zip: Houston, Texas 77066Agent (if applicable) Linda Plummer

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- |  |   |  |   |
|--|---|--|---|
| <input checked="" type="checkbox"/> Citation                   | <input type="checkbox"/> Citation by Posting          | <input type="checkbox"/> Citation by Publication | <input type="checkbox"/> Citations Rule 106 Service |
| <input type="checkbox"/> Citation Scire Facias                 | Newspaper _____                                       |  |   |
| <input type="checkbox"/> Temporary Restraining Order           | <input type="checkbox"/> Precept                      | <input type="checkbox"/> Notice                  |   |
| <input type="checkbox"/> Protective Order                      |   |  |   |
| <input type="checkbox"/> Secretary of State Citation (\$12.00) | <input type="checkbox"/> Capias (not an E-Issuance)   | <input type="checkbox"/> Attachment              |   |
| <input type="checkbox"/> Certiorari                            | <input type="checkbox"/> Highway Commission (\$12.00) |  |   |
| <input type="checkbox"/> Commissioner of Insurance (\$12.00)   | <input type="checkbox"/> Hague Convention (\$16.00)   | <input type="checkbox"/> Garnishment             |   |
| <input type="checkbox"/> Habeas Corpus                         | <input type="checkbox"/> Injunction                   | <input type="checkbox"/> Sequestration           |   |
| <input type="checkbox"/> Subpoena                              |   |  |   |
| <input type="checkbox"/> Other (Please Describe) _____         |   |  |   |

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- |  |   |
|--|---|
| <input type="checkbox"/> ATTORNEY PICK-UP (phone) _____  | <input checked="" type="checkbox"/> E-Issuance by District Clerk<br>(No Service Copy Fees Charged)  |
| <input type="checkbox"/> MAIL to attorney at: _____  | <i>Note:</i> The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.<br>Visit <a href="http://www.hcdistrictclerk.com">www.hcdistrictclerk.com</a> for more instructions. |
| <input type="checkbox"/> CONSTABLE   |   |
| <input type="checkbox"/> CERTIFIED MAIL by District Clerk  |   |
| <input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____ |   |
| <input type="checkbox"/> OTHER, explain <u>Please email kbateam@arnolditkin.com</u>              |   |

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136244 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**Marilyn Burgess**

HARRIS COUNTY DISTRICT CLERK

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Matheson Tri-Gas, Inc.Address of Service: 1999 Bryan Street, Suite 900City, State & Zip: Dallas, Texas 75201Agent (if applicable) CT Corporation System

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias ☐ Newspaper \_\_\_\_\_
- ☐ Temporary Restraining Order ☐ Precept ☐ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not an E-Issuance) ☐ Attachment
- ☐ Certiorari ☐ Highway Commission (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_
- ☐ MAIL to attorney at: \_\_\_\_\_
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by District Clerk
- ☒ E-Issuance by District Clerk  
(No Service Copy Fees Charged)  
*Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.  
Visit www.hcdistrictclerk.com for more instructions.*
- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_
- ☐ OTHER, explain Please email kbateam@arnolditkin.com

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800





I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136245 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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# Marilyn Burgess

## HARRIS COUNTY DISTRICT CLERK

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Western International Gas & Cylinders, Inc.Address of Service: 7173 Highway 159 E.City, State & Zip: Bellville, Texas 77418Agent (if applicable) Denise C. Haugen

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- |  |   |  |   |
|--|---|--|---|
| <input checked="" type="checkbox"/> Citation                   | <input type="checkbox"/> Citation by Posting          | <input type="checkbox"/> Citation by Publication | <input type="checkbox"/> Citations Rule 106 Service |
| <input type="checkbox"/> Citation Scire Facias                 | Newspaper _____                                       |  |   |
| <input type="checkbox"/> Temporary Restraining Order           | <input type="checkbox"/> Precept                      | <input type="checkbox"/> Notice                  |   |
| <input type="checkbox"/> Protective Order                      |   |  |   |
| <input type="checkbox"/> Secretary of State Citation (\$12.00) | <input type="checkbox"/> Capias (not an E-Issuance)   | <input type="checkbox"/> Attachment              |   |
| <input type="checkbox"/> Certiorari                            | <input type="checkbox"/> Highway Commission (\$12.00) |  |   |
| <input type="checkbox"/> Commissioner of Insurance (\$12.00)   | <input type="checkbox"/> Hague Convention (\$16.00)   | <input type="checkbox"/> Garnishment             |   |
| <input type="checkbox"/> Habeas Corpus                         | <input type="checkbox"/> Injunction                   | <input type="checkbox"/> Sequestration           |   |
| <input type="checkbox"/> Subpoena                              |   |  |   |
| <input type="checkbox"/> Other (Please Describe) _____         |   |  |   |

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- |  |   |
|--|---|
| <input type="checkbox"/> ATTORNEY PICK-UP (phone) _____  | <input checked="" type="checkbox"/> E-Issuance by District Clerk<br>(No Service Copy Fees Charged)  |
| <input type="checkbox"/> MAIL to attorney at: _____  | <i>Note:</i> The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.<br>Visit <a href="http://www.hcdistrictclerk.com">www.hcdistrictclerk.com</a> for more instructions. |
| <input type="checkbox"/> CONSTABLE   |   |
| <input type="checkbox"/> CERTIFIED MAIL by District Clerk  |   |
| <input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____ |   |
| <input type="checkbox"/> OTHER, explain <u>Please email kbateam@arnolditkin.com</u>              |   |

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136246 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**Marilyn Burgess**

HARRIS COUNTY DISTRICT CLERK

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Teledyne Technologies Inc. f/k/a Detcon, Inc.Address of Service: 1601 Elm Street, Suite 4360City, State & Zip: Dallas, Texas 75201Agent (if applicable) Cogency Global, Inc.

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- |  |   |  |   |
|--|---|--|---|
| <input checked="" type="checkbox"/> Citation                   | <input type="checkbox"/> Citation by Posting          | <input type="checkbox"/> Citation by Publication | <input type="checkbox"/> Citations Rule 106 Service |
| <input type="checkbox"/> Citation Scire Facias                 | Newspaper _____                                       |  |   |
| <input type="checkbox"/> Temporary Restraining Order           | <input type="checkbox"/> Precept                      | <input type="checkbox"/> Notice                  |   |
| <input type="checkbox"/> Protective Order                      |   |  |   |
| <input type="checkbox"/> Secretary of State Citation (\$12.00) | <input type="checkbox"/> Capias (not an E-Issuance)   | <input type="checkbox"/> Attachment              |   |
| <input type="checkbox"/> Certiorari                            | <input type="checkbox"/> Highway Commission (\$12.00) |  |   |
| <input type="checkbox"/> Commissioner of Insurance (\$12.00)   | <input type="checkbox"/> Hague Convention (\$16.00)   | <input type="checkbox"/> Garnishment             |   |
| <input type="checkbox"/> Habeas Corpus                         | <input type="checkbox"/> Injunction                   | <input type="checkbox"/> Sequestration           |   |
| <input type="checkbox"/> Subpoena                              |   |  |   |
| <input type="checkbox"/> Other (Please Describe) _____         |   |  |   |

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- |  |   |
|--|---|
| <input type="checkbox"/> ATTORNEY PICK-UP (phone) _____  | <input checked="" type="checkbox"/> E-Issuance by District Clerk<br>(No Service Copy Fees Charged)  |
| <input type="checkbox"/> MAIL to attorney at: _____  | <i>Note:</i> The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.<br>Visit <a href="http://www.hcdistrictclerk.com">www.hcdistrictclerk.com</a> for more instructions. |
| <input type="checkbox"/> CONSTABLE   |   |
| <input type="checkbox"/> CERTIFIED MAIL by District Clerk  |   |
| <input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____ |   |
| <input type="checkbox"/> OTHER, explain <u>Please email kbateam@arnolditkin.com</u>              |   |

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136247 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**Marilyn Burgess**

HARRIS COUNTY DISTRICT CLERK

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Teledyne Exploration CompanyAddress of Service: 1999 Bryan Street, Suite 900City, State & Zip: Dallas, Texas 75201Agent (if applicable) CT Corporation

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation    ☐ Citation by Posting    ☐ Citation by Publication    ☐ Citations Rule 106 Service  
☐ Citation Scire Facias    Newspaper \_\_\_\_\_  
☐ Temporary Restraining Order    ☐ Precept    ☐ Notice  
☐ Protective Order  
☐ Secretary of State Citation (\$12.00)    ☐ Capias (not an E-Issuance)    ☐ Attachment  
☐ Certiorari    ☐ Highway Commission (\$12.00)  
☐ Commissioner of Insurance (\$12.00)    ☐ Hague Convention (\$16.00)    ☐ Garnishment  
☐ Habeas Corpus    ☐ Injunction    ☐ Sequestration  
☐ Subpoena  
☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_  
☐ MAIL to attorney at: \_\_\_\_\_  
☐ CONSTABLE  
☐ CERTIFIED MAIL by District Clerk  
☒ E-Issuance by District Clerk  
     (No Service Copy Fees Charged)  
*Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents. Visit www.hcdistrictclerk.com for more instructions.*  
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_  
☐ OTHER, explain Please email kbateam@arnolditkin.com

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136248 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**Marilyn Burgess**

HARRIS COUNTY DISTRICT CLERK

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**Request for Issuance of Service**

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: Plaintiffs' Original PetitionFILE DATE: 06/30/2020 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Automation Plus, Inc.Address of Service: 3705 Pine Lawn DriveCity, State & Zip: Pearland, Texas 77581Agent (if applicable) Frank Lomelo

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation    ☐ Citation by Posting    ☐ Citation by Publication    ☐ Citations Rule 106 Service  
☐ Citation Scire Facias    Newspaper \_\_\_\_\_  
☐ Temporary Restraining Order    ☐ Precept    ☐ Notice  
☐ Protective Order  
☐ Secretary of State Citation (\$12.00)    ☐ Capias (not an E-Issuance)    ☐ Attachment  
☐ Certiorari    ☐ Highway Commission (\$12.00)  
☐ Commissioner of Insurance (\$12.00)    ☐ Hague Convention (\$16.00)    ☐ Garnishment  
☐ Habeas Corpus    ☐ Injunction    ☐ Sequestration  
☐ Subpoena  
☐ Other (Please Describe) \_\_\_\_\_

(See additional Forms for Post Judgment Service)

**SERVICE BY (check one):**

- ☐ ATTORNEY PICK-UP (phone) \_\_\_\_\_  
☐ MAIL to attorney at: \_\_\_\_\_  
☐ CONSTABLE  
☐ CERTIFIED MAIL by District Clerk  
☒ E-Issuance by District Clerk  
     (No Service Copy Fees Charged)  
*Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents. Visit www.hcdistrictclerk.com for more instructions.*  
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_  
☐ OTHER, explain Please email kbateam@arnolditkin.com

Issuance of Service Requested By: Attorney/Party Name: Kurt Arnold Bar # or ID 24036150Mailing Address: 6009 Memorial Drive, Houston, TX 77007Phone Number: (713) 222-3800





I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 1, 2020

Certified Document Number: 91136249 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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